### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

JILL ALTMAN, Individually and on behalf of a class,	
Plaintiff, )	Civil Action No. 1:15-cv-02451-SCJ-
v. )	CMS
WHITE HOUSE BLACK MARKET, ) INC., and DOES 1-10,	
Defendants.	)
)	
)	

# PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT

COMES NOW Plaintiff, Jill Altman, ("Plaintiff"), pursuant Fed. R. Civ. P. 6(b), and moves the Court to grant her a three week extension of time in order for Plaintiff to file her response to the Defendants' Motion to Dismiss Plaintiff's Complaint (*Doc. No. 13*). Defendants were previously accommodated by Plaintiff with a 30 day extension to answer or move with respect to the Complaint. The requested extension would permit Plaintiff to respond to the Motion to Dismiss on or before October 14, 2015.

Plaintiff's response to the Motion is otherwise due September 23, 2015. This motion is Plaintiff's first request for an extension of time within which to

respond to the Motion to Dismiss. Plaintiff contacted Defendants about consenting to this request and Defendants have responded that they have no objection to the extension request.

Good cause exists for the requested extension. Observation of the Jewish High Holy Days, which fall during the period during which counsel has to respond to the Motion to Dismiss, has cost and will cost counsel a significant portion of the time allotted to prepare a response. Affording Plaintiff sufficient time to prepare her response would serve the interests of justice. The requested extension is not sought to delay the litigation and would not prejudice any party.

WHEREFORE, Plaintiff respectfully prays that the Court enter an Order extending the time within which Plaintiff may file her response to Defendants' Motion to Dismiss to October 14, 2015.

Respectfully submitted,

/s/ Shimshon E. Wexler
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## **ORDER**

GOOD CAUSE APPEARING	THEREFORE,IT IS SO ORDERED.
Dated:	U.S.M.J. or U.S.D.J.

## **CERTIFICATE OF COMPLIANCE**

The undersigned certifies that 14 point New Times Roman was used for this document and that it has been formatted in compliance with Local Rule 5.4.

DATED: September 17, 2015.

/s/ Shimshon Wexler

Shimshon Wexler

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 17, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which electronically delivered a copy to the parties listed below.

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/s/ Shimshon Wexler
An Attorney for Plaintiff